

REMARKS

This is in response to the Office Action mailed July 2, 2007. In the Office Action, all claims 1-24 were pending and rejected. With this amendment, claims 1-10, 14-17 and 23 are amended; and the remaining claims are unchanged in the application.

Section Three of the Office Action asserted that claim 14 is non-statutory because it is allegedly software per se. The explanation with respect to the rejection set forth in Section Three of the Office Action refers to "claim 52", but given that the current application only lists 24 claims, Applicant respectfully believes that is simply a typographical error. Applicant has amended independent claim 14 to recite that the business software system is embodied on at least one computer-readable storage medium. As set forth on Page Ten of Applicant's specification, at line 17, "By way of example, and not limitation, computer-readable media may comprise computer storage media and communication media." Accordingly, Applicant respectfully submits that ample support for the amendment of independent claim 14 is provided by the specification. Further, Applicant respectfully submits that the recitation of compute-readable storage medium preemptively addresses the rationale set forth with respect to claim 23 that the mere recitation of "computer-readable medium," given Applicant's specification is potentially non-statutory. By reciting compute-readable "storage" medium the carrier waves are excluded.

Section Four of the Office Action indicated that independent claim 23 was rejected as allegedly non-statutory because it was allegedly not tangibly embodied. Applicant has amended independent claim 23 to recite "a computer-readable storage medium." (Emphasis Added). Accordingly, Applicant respectfully submits that with the amendment of claim 23 that the possibility of the computer data signal being embodied in the carrier wave is excluded from the language of amended claim 23.

Applicant respectfully submits that all claims currently set forth in the application comply with 35 U.S.C. §101.

Section Five of the Office Action indicated that independent claims 1, 14, 23 and 24, among others, were rejected under 35 U.S.C. §103(a) as being unpatentable over Sonera (Web Services White Paper) in view of Flurry et al. (U.S. Patent 7,188,155 - hereinafter Flurry).

Applicant will address the manner in which each of the independent claims is allowable over the hypothetical combination of Sonera and Flurry in turn.

Independent claim 1 has been amended in order to better distinguish that claim from the hypothetical combination of Sonera and Flurry. Specifically, claim 1 has been amended to recite discovering information about a first stand-alone business software application as well as discovering information about a second stand-alone business software application. Support for this amendment can be found, at least, on page 18, lines 24-29. Applicant respectfully notes that the Sonera reference is being used to provide the alleged “business software components” of original independent claim 1. In this regard, Section Five of the Office Action indicates that such business software components are provided in Section Two, lines 6-7 of the Sonera reference. That section describes the “service provider” within the web services architecture. Specifically, the Sonera reference provides, “The service provider can represent a business entity or a reusable subsystem.” Instead of arguing whether a service provider in the web services architecture is a business software component, Applicant has amended independent claim 1 to recite a plurality of stand-alone business software applications. There is no teaching or suggestion in the Sonera reference that the “service provider” is, or would be such a system. Additionally, notwithstanding this important distinction, Applicant respectfully notes that Section Five of the Office Action also employs the Sonera reference to provide the feature of the “model-driven bus.” In particular, Section Five of the Office Action indicates that Section Seven, lines 9-16 of the Sonera reference provide the feature of binding the at least one first/second component capability or first component requirement to a first/second role in a model-driven bus. However, lines 9-16 simply provide, in the context of the web services architecture,

“The requestor binds to the service by retrieving this document and creating the necessary functionality for accessing service (3). For example, it may be necessary to generate client stubs that hide the actual SOAP communication. Finally, the requestor can invoke the service (4). The ultimate goal is for the service requester to be able to automatically discover services on demand and dynamically bind to them, at runtime. However, web services are still in their infancy and the specifications have not yet matured.”

Accordingly, the Summary of the Sonera reference is merely indicating the manner in which a service requestor in the web services architecture can discover services and employ them. There is no teaching or suggestion of a model-driven bus. Accordingly, Applicant respectfully submits that amended independent claim 1 is allowable over Soner and Flurry, taken alone or in combination.

Independent claim 14 has been amended similarly to independent claim 1. Specifically, amended independent claim 14 now recites first and second business software applications bound to and fulfilling first and second portions of a software bus. As set forth above, Applicant respectfully submits that the features of multiple business software applications are not met by the mere recitation of a “service provider” in the web services architecture. Accordingly, Applicant respectfully submits that amended independent claim 14 is allowable over Sonera and Flurry, taken alone or in combination.

Independent claim 23 has been amended to address the statutory subject matter rejection. However, no further amendments to independent claim 23 have been made. With respect to independent claim 23, Section Five of the Office Action indicated, “It is an apparatus claim of claim 1; therefore it is rejected for the same reasons as claim 1 above.” With respect to the assertion on Page Five of the Office Action that claim 23 is an apparatus claim of claim 1, that is simply incorrect. Independent claim 23 recites a computer-readable storage medium having a standardized adapter comprising a software component side that is custom-configured to interact with a specific business software component and a standardized side coupled to the software component side and adapted to interact with a standardized, durable application programming interface. Such a software adapter is simply not part of independent claim 1, nor is it a necessary requirement therefrom. Page Six of the Office Action appears to allegedly read portions of the Flurry reference in column 10, lines 5-50 onto the features recited in independent claim 23. However, the piecemeal manner in which this is performed actually indicates that the components of Flurry that allegedly meet the limitations of independent claim 23 do not actually interact as required by independent claim 23. Specifically, Applicant respectfully submits that to the extent that any adapter exists in the disclosure of Flurry (and in particular in FIG. 5) that it is

upon client device 510. To the extent that this rejection may be maintained, Applicant respectfully requests that the Office Action point to reference numerals in the well-labeled FIG. 5 of Flurry of feature elements that actually correspond to features of independent claim 23. Specifically, where in FIG. 5 is the adapter? Where is the software component side that is custom-configured to interact with a specific business component? Where is the standardized side? Where is the durable application interface? Where is the data relative to at least one business process that is not supported by the software component? While the Office Action has pointed to citations of the Flurry reference, the cited portions do not truly meet the limitations of independent claim 23, and most certainly do not interact in the manner set forth in independent claim 23. Accordingly, Applicant respectfully submits that amended independent claim 23 is allowable over Sonera and Flurry, taken alone or in combination.

Independent claim 24, in its original form, is believed to be allowable over Sonera and Flurry. With respect to independent claim 24, Section Five of the Office Action, on Page Six, asserted, "It is an apparatus claim of claim 23." Respectfully, independent claim 24 is a method claim. Additionally, independent claim 24 is a method of retrofitting a stand-alone business software component for use in an automatically integrating business software system. Further, the method includes describing capabilities of a stand-alone business software component with metadata; describing requirements of the stand-alone business software component with metadata; and generating a standardized software adapter. Both elements of describing capabilities and requirements are not set forth in independent claim 23. Accordingly, Applicant respectfully submits that it cannot be rejected "for the same reason a [sic] claim 23 above." While Applicant notes that Page Six of the Office Action asserts that Flurry teaches metadata (WSDL), Applicant respectfully submits that the WSDL description of a web service is not equivalent, nor an obvious extension of the method steps of describing capabilities and requirements of a stand-alone business software component. Accordingly, Applicant respectfully submits that independent claim 24 is allowable over Sonera and Flurry, taken alone or in combination.

In conclusion, Applicant respectfully submits that independent claims 1, 14, 23 and 24 are allowable over the art of record. Further, Applicant respectfully submits that dependent claims 2-13 and 15-22 are allowable as well by virtue of their dependency, either directly or indirectly, from allowable independent claims. Applicant submits that the entire application is now in condition for allowance. Reconsideration and favorable action are respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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